

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: XXXX

Region: Wilmington Regional Office
County: Brunswick
NC Facility ID: 1000083
Inspector's Name: Mark Hedrick
Date of Last Inspection: 12/15/2016
Compliance Code: 3 / Compliance - inspection

Facility Data Applicant (Facility's Name): Technical Coating International, Inc. Facility Address: Technical Coating International, Inc. 150 Backhoe Road Leland, NC 28451 SIC: 3089 / Plastics Products, Nec NAICS: 337215 / Showcase, Partition, Shelving, and Locker Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				Permit Applicability (this application only) SIP: 15A NCAC 02Q .0513 NSPS: NA NESHAP: NA PSD: NA PSD Avoidance: VOCs - updated NC Toxics: NA 112(r): NA Other: MACT Avoidance - updated			
Contact Data				Application Data			
Facility Contact Sean Moody President (910) 371-0860 150 Backhoe Road Leland, NC 28451	Authorized Contact Sean Moody President (910) 371-0860 150 Backhoe Road Leland, NC 28451	Technical Contact Sean Moody President (910) 371-0860 150 Backhoe Road Leland, NC 28451	Application Number: 1000083.16A Date Received: 11/28/2016 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 07436/T09 Existing Permit Issue Date: 09/19/2012 Existing Permit Expiration Date: 08/31/2017				
Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	---	0.5700	138.83	0.4800	0.0400	1.98	1.98 [Toluene]
2014	---	0.5600	185.63	0.4700	0.0400	1.60	1.60 [Toluene]
2013	0.0100	1.37	167.28	1.15	0.1000	0.1501	0.1501 [Toluene]
2012	0.0100	1.15	119.76	0.8800	0.0800	0.5105	0.5105 [Toluene]
2011	---	0.6500	100.23	0.5400	0.0500	0.4640	0.4640 [Toluene]
Review Engineer: Lori Ann Phillips Review Engineer: Booker T. Pullen Review Engineer's Signature: Date: XXXX					Comments / Recommendations: Issue: 07436/T10 Permit Issue Date: XXXX Permit Expiration Date: XXXX		

1. Purpose of Application:

Technical Coating International, Inc. (TCI) has submitted a renewal application for their current Title V air permit, 07436T09. The application was received on November 28, 2016 at the Raleigh Central Office, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

The facility is located at 150 Backhoe Road in Leland, Brunswick County, NC. No changes to the air permit are being requested at this time.

2. Facility Description:

TCI manufactures spools of laminate material primarily for packaging in the electronics and computer industries. The main raw materials are rolls of polyethylene and polypropylene. TCI has the capability to coat, laminate, lacquer, print, metalize, and slit plastic films, papers, coated fabrics, and foils.

The facility has a thermal oxidizer (TO) [ID No. CD-1] that can be used to control the emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from its coaters/laminators (ID Nos. SI through S4). The TO can only control one coater/laminator at a time. Currently, production at the facility is such that TCI can meet its PSD avoidance limit without having to run the TO. TCI only operates the TO when it runs HAP coatings to ensure that the facility stays within its limit to avoid being a major source for HAPs. TCI typically runs HAP coatings only a few times per year. A note in the most recent inspection report from September 2016 indicates that the TO has not operated since January 2016 as no HAPs have been used at the facility since that time.

3. Application Chronology:

September 12, 2012	The facility was issued a renewed permit, T09.
September 19, 2016	The facility was inspected by Mark Hedrick and found to be in compliance.
November 22, 2016	Received Title V renewal application at the Wilmington Regional Office.
November 28, 2016	Received Title V renewal application at the Raleigh Central Office. The application package included all necessary forms, signatures, and supporting documentation. No fee is required for a renewal application.
November 30, 2016	Sent acknowledgement letter to Sean Moody, President.

4. New Equipment/Changes in Emissions and Regulatory Review:

New Equipment: There is no new equipment associated with this Title V permit renewal.

Change in Emissions: There are no changes in emissions associated with this Title V permit renewal.

Regulatory Review: TCI is subject to the following regulations. An extensive regulatory review for each applicable regulation will not be included in this document for the rules that apply to sources without any changes.

15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes – no changes

15A NCAC 02D .0516, Sulfur Dioxide Control Requirement – no changes

15A NCAC 02D .0521, Control of Visible Emissions – no changes

15A NCAC 02D .0958, VOC Work Practices – Removed this regulation from the permit as it no longer applies state-wide, effective November 1, 2016.

15A NCAC 02D .1100, Control of TAPs – no changes

15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions – no changes

Changes were made to the following avoidance conditions in the air permit.

- 15A NCAC 02Q .0317 of 02D .0530, PSD Avoidance – This condition has been updated with the results and parameters established during the most recent performance testing conducted on the thermal oxidizer, CD-1.
- 15A NCAC 02Q .0317 of 02D .1111, MACT Avoidance – This condition has been updated with the results and parameters established during the most recent performance testing conducted on the thermal oxidizer, CD-1.

5. Changes to Permit:

- Updated all dates and permit revision numbers
- Changed the name of the department to “Department of Environmental Quality”
- Added the leading “0” to all NC Administrative Code citations
- Updated the General Conditions to version 4.0
- Removed 15A NCAC 02D .0958 for VOC Work Practices, as this rule is no longer applicable state-wide effective November 1, 2016.
- Updated the operating parameters (combustion temperature, control efficiency, etc.) associated with the thermal oxidizer (CD-1), as determined through performance testing conducted on October 27, 2016, in the PSD Avoidance condition for VOCs.
- Updated the operating parameters (combustion temperature, control efficiency, etc.) associated with the thermal oxidizer (CD-1), as determined through performance testing conducted on October 27, 2016, in the MACT Avoidance condition for HAPs.

6. NSPS, NESHAPS, MACT, PSD, and Attainment Status:

This facility is not subject to any NSPS requirements.

TCI has accepted a MACT 4J avoidance condition to ensure that emissions of HAPs remain below 10 tons per year of a single HAP and 25 tons per year for all HAPs per 12-month period. No other NESHAPS or MACT regulations apply.

The facility is a major source for PSD and located in Brunswick County, which is in attainment for all criteria pollutants. TCI has previously accepted two avoidance conditions for PSD. The facility is subject to an emission limits of 250 tons per year of VOCs from the coater laminators, ID Nos. S1 and S2, and a second emissions limits of 250 tons per year of VOCs from coater laminators, ID Nos. S3 and S4. Continued compliance is expected.

7. Facility Wide Air Toxics:

The facility is currently subject to modeled emission rates for ethyl acetate, methyl ethyl ketone, toluene, toluene-2, 4-diisocyanate, and xylene. This permit renewal does not affect this status. An updated toxics review is not required at this time. This modification does not present an unsafe health risk.

8. Compliance Status:

The last inspection was performed on December 15, 2016 by Mr. Mark Hedrick of the Wilmington Regional Office. The facility was found to be operating in compliance with all portions of their air permit at the time of the inspection.

9. Facility Emissions Review:

There are no changes to Title V potential emissions for this permit renewal. Actual emissions, as reported through annual emissions inventories, are summarized in the table on the first page of this permit review document.

10. Other Considerations:

- A P.E. seal is NOT required for this renewal application.
- A zoning consistency determination is NOT required for this renewal application.
- This facility is not subject to the 112(r) program as it does not store any of the listed chemicals in quantities above the program thresholds.
- The facility is exempt from CAM.

11. Public Notice Review:

A 30-day public notice and 45-day EPA review period is required for this permit renewal.

The 30-day public notice period was from XX through XX.

The EPA 45-day review period was from XX through XX.

12. Conclusions, Comments, and Recommendations:

This air permit application for renewal of the Title V air permit held by Technical Coating International, Inc., located at 150 Backhoe Road in Leland, Brunswick County, has been reviewed by DAQ to determine compliance with all procedures and requirements. The XXXX Regional Office has made comments on the draft permit. Continued compliance with this air permit is expected. Recommend issuance of revised air permit No. 07436T10.